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Attorneys for Defendant Meta Platforms, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

IN RE META PIXEL TAX FILING CASES

Case No. 5:22-cv-07557-PCP (VKD)

This Document Relates To:

All Actions

**DECLARATION OF LAUREN R.
GOLDMAN IN SUPPORT OF
DEFENDANT'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED**

Hon. P. Casey Pitts

I, Lauren R. Goldman, state and declare as follows:

1. I am an attorney licensed to practice in the State of New York. I am a partner at the law firm Gibson, Dunn & Crutcher LLP, counsel of record for Defendant Meta Platforms, Inc. (“Meta”) in these actions. I am admitted *pro hac vice* to practice before this Court. I am familiar with Meta’s treatment of proprietary and confidential information based on my personal experience representing Meta.¹ I have personal knowledge of the facts stated below and, if called as a witness, I could and would testify competently thereto.

2. I submit this declaration under Local Rule 79-5(f)(3) in support of Meta’s Administrative Motion to Consider Whether Another Party’s Materials Should Be Sealed.

3. A true and correct copy of the unredacted versions of the documents listed below are being filed herewith. Highlighted within the documents and identified in the table below are the items Meta moves to file under seal provisionally, based on plaintiffs’ and third party’s asserts of confidentiality.

Document	Designating Party	Portion(s) to be Sealed
Meta’s Opposition to Plaintiffs’ Motion for Class Certification	Plaintiffs	Page 5, lines 20-27; page 6, lines 1-2, 16-25; page 10, lines 13-14, 22-25; page 11, lines 1-4; page 13, lines 22-23; page 14, lines 7-8; page 16, lines 19-24; page 17, line 1; page 18, lines 8-15; page 19, lines 8-9; page 20, line 2; page 21, line 16; page 24, lines 18-19.
Exhibit 5 to the Barrera Declaration	TaxAct	Pages 5-78.
Exhibit 12 to the Barrera Declaration	Plaintiffs	Sealed in full.
Exhibit 13 to the Barrera Declaration	Plaintiffs	Sealed in full.

¹ Courts in this District routinely grant motions to seal on the basis of declarations of counsel submitted pursuant to Local Rule 79-5. *See, e.g., Avago Techs. Fiber IP (Singapore) PTE. Ltd., v. IPtronics Inc.*, No. 5:10-cv-02863-EJD, Dkt Nos. 544 (N.D. Cal. Apr. 3, 2015), 545 (N.D. Cal. Apr. 7, 2015); *Cisco Sys. Inc., v. OpenTV Inc.*, No. 5:13-cv-00282-EJD, Dkt. Nos. 76, 82 (N.D. Cal. Oct. 8, 2013). I am personally familiar with Meta’s practices of safeguarding proprietary information, including based on my experience representing Meta for many years, but if the Court deems this declaration insufficient, Meta respectfully requests that it be permitted to file a further declaration supporting filing under seal.

Exhibit 20 to the Barrera Declaration	Plaintiffs	Sealed in full.
Exhibit 21 to the Barrera Declaration	Plaintiffs	Sealed in full.
Exhibit 22 to the Barrera Declaration	Plaintiffs	Sealed in full.
Exhibit 23 to the Barrera Declaration	Plaintiffs	Sealed in full.
Exhibit 24 to the Barrera Declaration	Plaintiffs	Sealed in full.
Exhibit 25 to the Barrera Declaration	Plaintiffs	Sealed in full.
Exhibit 26 to the Barrera Declaration	Plaintiffs	Sealed in full.
Exhibit 27 to the Barrera Declaration	Plaintiffs	Sealed in full.
Exhibit 28 to the Barrera Declaration	Plaintiffs	Sealed in full.
Exhibit 29 to the Barrera Declaration	Plaintiffs	Sealed in full.
Exhibit 30 to the Barrera Declaration	Plaintiffs	Page 74, lines 9-25; page 75, lines 1-25; page 76, lines 1-25; page 77, lines 1-25; page 78, lines 1-12.
Exhibit 31 to the Barrera Declaration	Plaintiffs	Sealed in full.
Exhibit 32 to the Barrera Declaration	Plaintiffs	Page 42, lines 9-25; page 43, lines 1-13; page 149, lines 16-25; page 150, lines 1-22; page 167, lines 3-4, 6-9, 12, 24-25; page 168, lines 1-3, 5, 8, 11, 21-23.
Exhibit 33 to the Barrera Declaration	Plaintiffs	Page 83, lines 22-25; page 84, lines 1-7, 11-15; page 85, lines 10-25; page 133, lines 4-25; page 134, lines 1-25; page 135, lines 1-25; page 136, lines 2-25; page 142, lines 11-18, 22-25; page 143, lines 1-7; page 197, line 3.

Exhibit 34 to the Barrera Declaration	Plaintiffs	Sealed in full.
Exhibit 35 to the Barrera Declaration	Plaintiffs	Page 39, lines 1-7, 15-25; page 207, lines 20-25; page 208, lines 1-25.
Exhibit 36 to the Barrera Declaration	Plaintiffs	Page 1, line 9; page 2, line 11; page 34, lines 6-22, 25; page 77, lines 3-6, 12-24; page 85, lines 11-25; page 101, lines 1-25; page 124, lines 1-9, 11-25; page 125, lines 1-13, 19-20, 23-25; page 126, lines 1-22; page 127, lines 1-25; page 128, lines 1-25; page 132, lines 3-25; page 200, lines 13-25; page 201, lines 3-25; page 202, lines 1-25; page 204, lines 1-25; page 206, lines 1-20, 23-25; page 213, lines 1-25; page 235, lines 2-25; page 236, lines 1-12;
Exhibit 37 to the Barrera Declaration	Plaintiffs	Sealed in full.
Exhibit 39 to the Barrera Declaration	Plaintiffs	Sealed in full.
Rebuttal Expert Report of Georgios Zervas, PhD	Plaintiffs	Page 41, paragraph 51, footnote 135; page 42, paragraph 54, footnote 138; page 44, paragraph 57, footnote 142; page 46, paragraph 60, footnote 153; page 48, paragraph 61, footnotes 156-157; page 49, footnote 159; page 50, paragraph 65, footnotes 161-162; page 52, paragraph 70, footnotes 172, 174; page 53, paragraph 71, footnote 175; page 54, paragraph 75, footnote 181; page 55, paragraph 78, footnotes 186-187; page 56, paragraph 78-79, footnotes 189, 192; page 57, paragraph 80, footnote 197; page 62, footnote 214; page 73, footnote 241; page 80, paragraph 80, footnotes 256-257; page 84, paragraph 107, footnote 266.
Rebuttal Expert Report of Georgios Zervas, PhD	TaxAct	Page 13, footnote 39; page 79, paragraph 103; page 80, paragraph 104, footnote 255; page 81, figure 24; page 82, figure 25, footnotes 259-260; page 85, paragraph 108; page 86, figure 29, paragraph 109; page 87, paragraphs 109-110.

Rebuttal Expert Report of Georgios Zervas, PhD	H&R Block	Page 79, paragraph 103; page 83, paragraph 106, figure 26.
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4. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 27th day of October 2025 in New York, New York.

/s/ Lauren R. Goldman
Lauren R. Goldman